REMARKS/ARGUMENTS

In the Final Office Action mailed April 19, 2005, the Examiner rejects claims 1-13 as follows:

- Claims 1-3, 6, 9, 10, 12, and 13 are rejected under 35 U.S.C. § 102(a), as allegedly anticipated by Applicant's admitted prior art ("the AAPA").

- Claims 4, 5, 7, 8, and 11 are rejected under 35 U.S.C. § 103(a), as allegedly obvious over the AAPA in view of U.S. Patent No. 6,104,874 to Branson et al. ("the Branson patent").

Applicant respectfully traverses the rejections of the claims, for the reasons set forth below.

The Invention

Before addressing the specific claim limitations, it will be helpful first to briefly summarize the invention of the pending claims.

The present invention provides a new Module-Centric organization of software objects. The invention adheres to basic object-oriented design principles; but, greatly improves on this paradigm through a new innovation which allows developers to design and construct comprehensive large-scale objects, called Modules. A single Module is in effect a virtual software object, configured and assembled at runtime. The Module is designed to support all facets of an entire business application process. The Module provides unsurpassed flexibility for design of the user interface, as any required data which is defined as part of the Module can be presented to or captured from the user from any presentation page, without rigid links between these user interface screens and specific software components. This feature greatly reduces design analysis and effort, allowing developers to work directly with end-users to rapidly design,

produce, and modify the presentation interface, without time-consuming software component coding changes.

In addition, the Module allows developers to directly access custom business logic components which they design and develop, without the need to develop and link specific action keywords to invoke the processing methods of these components. This feature enables virtually unlimited extension to accommodate even the most complex business processes, giving developers free access to all user data, data source data, and any other capabilities inherent to the application environment (such as access to other systems or capabilities which may reside outside the domain of the business application).

The end result is a highly efficient business application, composed of a small number of total components, and with only a select few of those components required to be manually designed and coded by the developer. Moreover, the components the developer is required to design and construct are those that are most crucial to system success, and therefore bring a greater return on development efforts. Accordingly, the final application is greatly simplified in design, without compromising business requirements. This approach allows developers to concentrate on the important task of defining and coding specific business processes, rather than construction and maintenance of the voluminous objects normally needed to support less important tasks.

The Rejection of Claims 1-3, 6, 9, 10, 12, and 13 Based on the Applicant's Admitted Prior Art ("the AAPA")

On pages 5-7 of the Office Action, independent claims 1, 6, and 10, and dependent claims 2, 3, 9, 12, and 13, are rejected under 35 U.S.C. § 102(a), as allegedly anticipated by the AAPA. Applicant respectfully traverses this rejection of claims 1-3, 6, 9, 10, 12, and 13.

The AAPA discloses business transaction applications that are designed for use over a network and developed using a three-tier architecturally layered approach. The three-tier approach utilizes a user presentation layer, an application server layer, and a data source layer. The user presentation layer provides an end-user interface for the application, the application server layer uses an application server that provides all processing for business application data, and the data source layer includes back-end database systems or services that are responsible for storing and managing business transaction data. However, the AAPA *fails* to teach or suggest a "Module . . . configured to prevent the need for a developer to implement a coding change selected from the group consisting of linking the user interface screen to a software component that supports the user interface screen and linking a keyword to the software component . . ." as required by amended independent claims 1, 6, and 10. For this reason, Applicant submits that the § 102 rejection of amended independent claims 1, 6, and 10, and dependent claims 2, 3, 9, 12, and 13, is improper and should be withdrawn.

The Rejection of Claims 4, 5, 7, 8, and 11 Based on the AAPA and the Branson Patent

On pages 7-9 of the Office Action, dependent claims 4, 5, 7, 8, and 11 are rejected under 35 U.S.C. § 103(a), as allegedly obvious over the AAPA in view of the Branson patent. Applicant respectfully traverses this rejection of dependent claims 4, 5, 7, 8, and 11.

The Branson patent discloses an object-oriented mechanism used to implement an order processing system in a manufacturing environment. Regarding the Branson patent, the Examiner states the following:

> Branson teaches a configuration process to define methods and data necessary for processing an order . . . Branson teaches an object-oriented framework mechanism for order processing. Branson's order processing framework includes core classes that define the core function of the framework mechanism and extensible classes that are defined by a user to implement a desired order-processing environment . . .

As noted previously, the AAPA *fails* to teach or suggest a "Module . . . configured to prevent the need for a developer to implement a coding change selected from the

group consisting of linking the user interface screen to a software component that supports the user interface screen and linking a keyword to the software component . . ." as required by amended independent claims 1, 6, and 10, and thus, dependent claims 4, 5, 7, 8, and 11. Also, the Branson patent *fails* to teach or suggest a "Module . . . configured to prevent the need for a developer to implement a coding change selected from the group consisting of linking the user interface screen to a software component that supports the user interface screen and linking a keyword to the software component . . ." as required by amended independent claims 1, 6, and 10, and thus, dependent claims 4, 5, 7, 8, and 11. Accordingly, neither the AAPA nor the Branson patent, nor the combination of the AAPA and Branson patent, teach or suggest the requirements of amended independent claims 1, 6, and 10, or dependent claims 4, 5, 7, 8, and 11. For these reasons, Applicant submits that the § 103 rejection of dependent claims 4, 5, 7, 8, and 11 is improper and should be withdrawn.

Conclusion

This application should now be in condition for a favorable action. Applicant respectfully requests entry of the Amendment and an early allowance of all claims herein. If for any reason the Examiner finds the application other than in allowance, the Examiner is requested to call the undersigned attorney at the below-listed telephone number to discuss the steps necessary for placing the application in condition for allowance. If there are any fees due in connection with the filing of this Amendment, please charge the fees to our Deposit Account No. 19-1853.

Respectfully submitted,
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